

# EXHIBIT K

**From:** [Bret Stanley](#)  
**To:** [Gromada, Veronica G. \(SHB\)](#); [Steven Cohn](#); [Chris Cox](#)  
**Cc:** [Roopal Luhana](#); [Rachel Abrams](#); [Sarah London](#); [Andrew Kaufman](#); [An Truong](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#)  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order  
**Date:** Tuesday, August 26, 2025 4:33:00 PM  
**Attachments:** [MER-L-360-24 - MDL Order RE Uber's Motin to Enforce Protective Order.msg](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Attached is the email sent to the Court in the *Lord* Matter that includes the Protective Order. If you desire to bring this to the attention of Judge Cisneros, I'd ask that we have a conversation about that first.

Sincerely,

Bret Stanley

---

**From:** Bret Stanley <bstanley@johnsonlawgroup.com>  
**Sent:** Tuesday, August 26, 2025 4:07 PM  
**To:** Gromada, Veronica G. (SHB) <vgromada@shb.com>; Steven Cohn <cohn@chaffinluhana.com>; Chris Cox <christopher.cox@kirkland.com>  
**Cc:** Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; An Truong <atruong@simmonsfirm.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Veronica –

The Correspondence to the Court in the *Lord* matter was hung in my outbox. We notified the court in both the *Jones* matter and in the *Smith* Matter. I didn't realize the email to Judge Hurd in the *Lord* matter was not received.

As you know, Uber Counsel for Bowman and Brook have now notified the Court in *Lord* and I intend to inform the Court now.

We can have a call about this today or tomorrow, at your convenience.

Sincerely,

Bret Stanley

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 22, 2025 5:54 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the Confidential Information, **and** Mr. Stanley shall identify to Defendants' counsel **all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;**

(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to all persons **and courts** identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. Lord: You have not provided a copy of the August 18, 2025 Order to the court.
2. Casey Jones: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.
3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 15, 2025 3:52 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 2:12 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

## EXTERNAL

Veronica,

Our proposed edits are attached in redline.

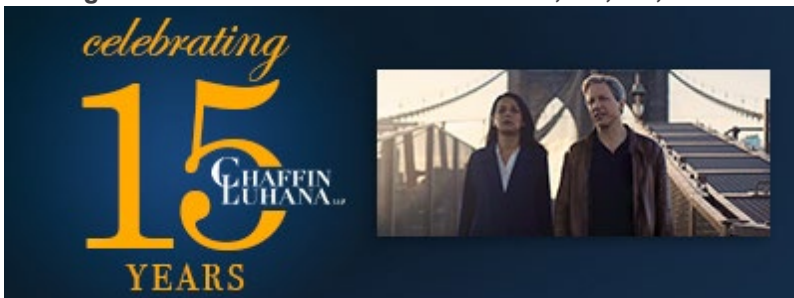
Thanks,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** [\(347\) 269-4465](tel:(347)269-4465)

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---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 1:43 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

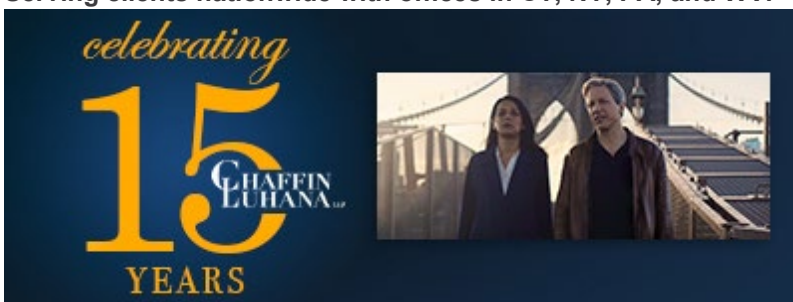
Thank you,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** [\(347\) 269-4465](tel:(347)269-4465)

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Friday, August 15, 2025 11:48 AM  
**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Thursday, August 14, 2025 1:28 PM  
**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>  
**Sent:** Thursday, August 14, 2025 11:24 AM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[kaufman@girardsharp.com](mailto:kaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

## EXTERNAL

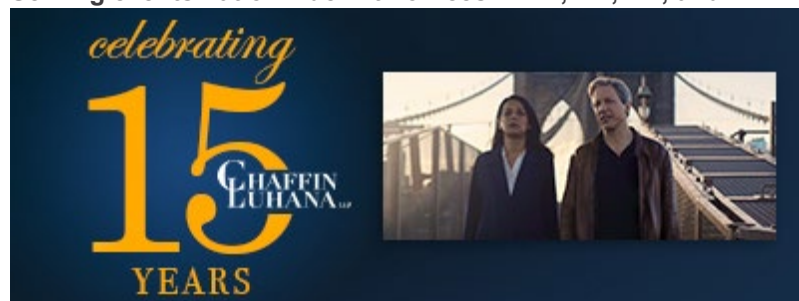
Thank you.

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** (347) 269-4465

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Thursday, August 14, 2025 12:22 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[kaufman@girardsharp.com](mailto:kaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>



**Subject:** In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Thursday, August 14, 2025 9:01 AM

**To:** Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>;

Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>;

Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>

**Subject:** In re Uber, Proposed Joint Order re Protective Order

## EXTERNAL

Veronica/Chris,

Per the Court's Order (ECF 3692), please let us know if you are available to meet and confer this afternoon regarding the Proposed Order related to the Protective Order. Alternatively, if you can send us a draft proposed order, we can review and let you know if we agree or have any proposed edits (and then meet and confer if there are any issues that remain).

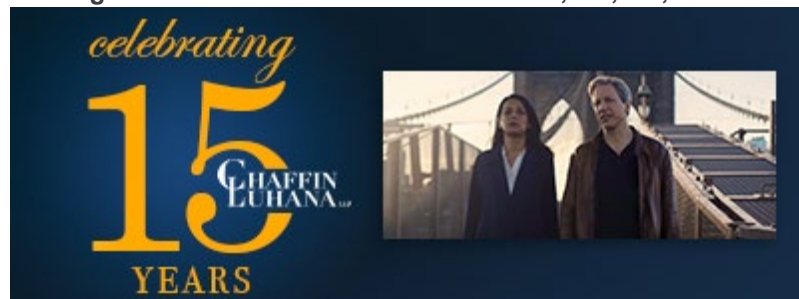
Thanks,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** [\(347\) 269-4465](tel:(347)269-4465)

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# EXHIBIT L

**From:** [Bret Stanley](#)  
**To:** [Douglas Hurd](#); [Matthew P. Kessler](#); [bstern@stark-stark.com](mailto:bstern@stark-stark.com)  
**Cc:** [Patricia Coslove](#); [chayalordz167087@stark-stark.filevineapp.com](mailto:chayalordz167087@stark-stark.filevineapp.com); [John W. Meyer](#); [Chris Carton](#); [Shiomara A. Frias](#); [Edward O'Toole](#); [Beatrice McCleese](#)  
**Subject:** MER-L-360-24 - MDL Order RE Uber's Motin to Enforce Protective Order  
**Date:** Tuesday, August 26, 2025 4:29:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[CivilCaseJacket - 2025-08-26T164710.724.pdf](#)  
[2025.08.18 Order RE Uber's Motion to Enforce Protective Order \(FS\).pdf](#)

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Judge Hurd –

I am in receipt of the attached letter from Uber's Counsel filed today that provides an Order to you from Judge Cisneros related to Uber's Motion to Enforce the Protective Order in MDL 3084.

I intended to send this Order to you previously. The email sending this Order to you was hung-up in my Outbox and was **not** delivered as I expected. The Order, attached here, found that identifying Uber's Knowledge Base Policies by name in the exhibit attached to Plaintiff Lord's 12<sup>th</sup> Notice to Produce documents was a breach of MDL 3084's Protective Order.

Plaintiff's Counsel also filed a request with this Court to remove the Exhibit to Plaintiff's 12<sup>th</sup> Notice to Produce from the New Jersey public filing system. This has been completed and the Exhibit to the Notice to Produce has been removed.

Sincerely,

Bret Stanley  
Counsel for Plaintiff Lord  
Admitted *Pro Hac Vice*

---

**From:** Douglas Hurd <douglas.hurd@njcourts.gov>  
**Sent:** Thursday, August 14, 2025 11:07 AM  
**To:** Matthew P. Kessler <mpkessler@zarwin.com>; [bstern@stark-stark.com](mailto:bstern@stark-stark.com)  
**Cc:** Patricia Coslove <PCoslove@stark-stark.com>; [chayalordz167087@stark-stark.filevineapp.com](mailto:chayalordz167087@stark-stark.filevineapp.com); Bret Stanley <bstanley@johnsonlawgroup.com>; John W. Meyer <John.Meyer@bowmanandbrooke.com>; Chris Carton <chris.carton@bowmanandbrooke.com>; Shiomara A. Frias <sfrias@zarwin.com>  
**Subject:** RE: [External] RE: MER-L-360-24

# EXHIBIT M

**From:** Bret Stanley  
**To:** "Gromada, Veronica G. (SHB)"; "Steven Cohn"; "Chris Cox"  
**Cc:** "Roopal Luhana"; "Rachel Abrams"; "Sarah London"; "Andrew Kaufman"; "An Truong"; "Priest Johnson, Kimberly (SHB)"; "Shortnacy, Michael (SHB)"; "Kirk, Brittany E. (SHB)"  
**Subject:** RE: In re Uber - Violation of Joint Order re Protective Order  
**Date:** Thursday, October 9, 2025 4:10:00 PM  
**Attachments:** [Judge Boyer req replace Exhibit A FILED 4905-4354-7249 v.1.pdf](#)  
[image002.png](#)  
[image004.png](#)  
[image006.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)

---

Attached the filing that was made today by counsel in the *Lord* matter.

---

**From:** Bret Stanley  
**Sent:** Thursday, October 9, 2025 3:18 PM  
**To:** 'Gromada, Veronica G. (SHB)' <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** RE: In re Uber - Violation of Joint Order re Protective Order

Veronica –

I was also surprised and was unaware that a filing was being made with the list of protected information related to Cisneros's Order. I share your disappointment and have had a very heated discussion with counsel questioning how this mistake could have been made.

The following steps have been made:

- Call to the coordinator this morning to immediately remove the filing.
- Consent Order to Delete the filing has been put on file.

I will make sure the filing is taken down. I have had the discussion with counsel that this should not have had happened and must never happen again.

If there are other steps you'd like me to take, please let me know.

Bret Stanley

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Thursday, October 9, 2025 1:37 PM  
**To:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** In re Uber - Violation of Joint Order re Protective Order

[EXTERNAL]

Bret,

We were shocked and beyond disappointed to see that Plaintiffs' counsel in *Lord* once again filed Uber's Confidential Information on the New Jersey docket in violation of the MDL Protective Order and Judge Cisneros' ruling on the Motion to Enforce.

Please let us know what you are doing to make sure it is removed from the docket immediately.

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Thursday, August 28, 2025 2:55 PM  
**To:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Thank you.

**Veronica G. Gromada**  
Partner  
Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>  
**Sent:** Thursday, August 28, 2025 2:19 PM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Veronica,

This was filed today in *Soto*.

Sincerely,

Bret Stanley

**Bret Stanley** | Senior Counsel



Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098  
 Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460  
[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com) | [www.johnsonlawgroup.com](http://www.johnsonlawgroup.com)

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**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Wednesday, August 27, 2025 3:54 PM

**To:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

(+Brittany Kirk. Please include her on future communications.)

Bret,

We are sorry for your loss. And thank you for the update.

Please send us confirmation once you have given notice to the Soto court.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



**From:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>

**Sent:** Wednesday, August 27, 2025 10:19 AM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

EXTERNAL

Veronica –

On Wednesday of last week the mother of my closest childhood friend passed after a 14-year battle with Parkinson's. She



was very dear to me. The visitation was Friday and funeral was Saturday in my hometown. On my way out of town, I intended for the email including the MDL Court's Order to go to Judge Hurd in the *Lord* matter and was surprised that it did not. Thereafter, I was dealing with personal matters and didn't realize that the email had not gone out to Judge Hurd until Uber's filing in the *Lord* matter yesterday. I recognize that you mentioned non-compliance in the *Lord* matter in your email below, however I thought you were working from stale information.

Concerning, the *Jones* matter, I contacted the Court and requested to send the information to the Court directly. However, since I am not counsel of record in that matter, the Court required a filing to occur with the Order and I requested a filing be made by Plaintiff's Counsel. From what Counsel of Record has told me, that filing was made and the *Jones* Court has been delivered the Order.

Concerning the *Soto* matter, my position remains that I did not disclose any information to the attorneys who are claimed to have made the requests subject to Cisneros's Order. I'm not counsel of record and no attorney connected to me claims to know who the attorneys are. I have called Corey Gaul and left a voicemail, but his email is not on Exhibit 17 and is not on their website. I am working to find information about which judge is handling the matter. I believe my intervention in the *Soto* matter is beyond the scope of the Order but **I am making efforts today to notify the attorneys involved and the Court.**

If you'd like to have a conversation about this, I'm available. If not, these will be my positions if you decide to move forward with a filing with Cisneros concerning lack of compliance.

Bret Stanley



**Bret Stanley** | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098  
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460  
[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com) | [www.johnsonlawgroup.com](http://www.johnsonlawgroup.com)

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**From:** Bret Stanley

**Sent:** Tuesday, August 26, 2025 4:33 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Attached is the email sent to the Court in the *Lord* Matter that includes the Protective Order. If you desire to bring this to the attention of Judge Cisneros, I'd ask that we have a conversation about that first.

Sincerely,

Bret Stanley

**From:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Sent:** Tuesday, August 26, 2025 4:07 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox

<[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Veronica –

The Correspondence to the Court in the *Lord* matter was hung in my outbox. We notified the court in both the *Jones* matter and in the *Smith* Matter. I didn't realize the email to Judge Hurd in the *Lord* matter was not received.

As you know, Uber Counsel for Bowman and Brook have now notified the Court in *Lord* and I intend to inform the Court now.

We can have a call about this today or tomorrow, at your convenience.

Sincerely,

Bret Stnaley

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 22, 2025 5:54 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the Confidential Information, **and** Mr. Stanley shall identify to Defendants' counsel **all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;**

(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to all persons **and courts** identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. Lord: You have not provided a copy of the August 18, 2025 Order to the court.
2. Casey Jones: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.
3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 15, 2025 3:52 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 2:12 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Veronica,

Our proposed edits are attached in redline.

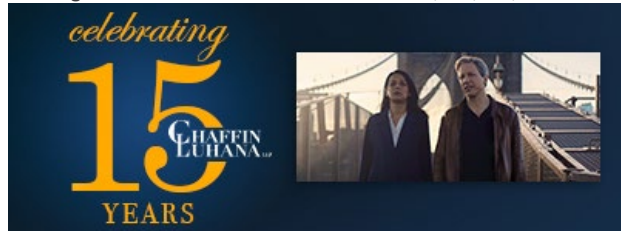
Thanks,  
Steve

**Steven Cohn | Partner**

E: [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

P: (347) 269-4465

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[ChaffinLuhanaFoundation.org](http://ChaffinLuhanaFoundation.org)

**Mailing Address:**

Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 1:43 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

Thank you,  
Steve

**Steven Cohn | Partner**

E: [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

P: (347) 269-4465

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**Mailing Address:**

Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 15, 2025 11:48 AM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Thursday, August 14, 2025 1:28 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Thursday, August 14, 2025 11:24 AM

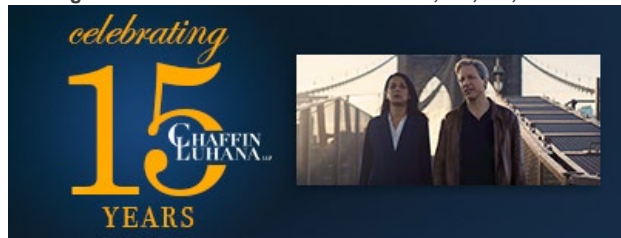
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Thank you.

**Steven Cohn | Partner**  
**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)  
**P:** (347) 269-4465

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[ChaffinLuhanaFoundation.org](http://ChaffinLuhanaFoundation.org)

**Mailing Address:**  
Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Thursday, August 14, 2025 12:22 PM  
**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>  
**Sent:** Thursday, August 14, 2025 9:01 AM  
**To:** Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London

<[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>;  
An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>

**Subject:** In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Veronica/Chris,

Per the Court's Order (ECF 3692), please let us know if you are available to meet and confer this afternoon regarding the Proposed Order related to the Protective Order. Alternatively, if you can send us a draft proposed order, we can review and let you know if we agree or have any proposed edits (and then meet and confer if there are any issues that remain).

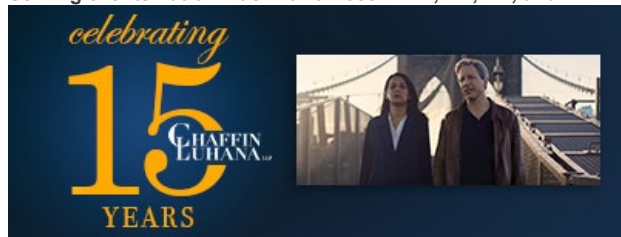
Thanks,  
Steve

**Steven Cohn | Partner**

E: [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

P: (347) 269-4465

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[ChaffinLuhanaFoundation.org](http://ChaffinLuhanaFoundation.org)



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# EXHIBIT N



**From:** [Bret Stanley](#)  
**To:** [Evan J. Lide](#); [Gromada, Veronica G. \(SHB\)](#); [Chris Cox](#)  
**Cc:** [Madeline S. Baio](#); [caseymjonesz175365@stark-stark.filevineapp.com](mailto:caseymjonesz175365@stark-stark.filevineapp.com); [Bruce H. Stern](#)  
**Bcc:** [caseymjonesz175365@stark-stark.filevineapp.com](mailto:caseymjonesz175365@stark-stark.filevineapp.com)  
**Subject:** RE: Protective Order Violations re: In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation; Case No. 2:23-md-03084-CRB  
**Date:** Wednesday, August 20, 2025 3:14:00 PM  
**Attachments:** [2025.08.18 Order RE Uber's Motion to Enforce Protective Order \(FS\).pdf](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

Ms. Baio –

While I did not disclose any information to you and we have never spoken, I am connected to Stark and Stark and portions of the notice to produce referenced below was ruled to be in breach of MDL 3084's Protective Order.

It is my understanding that no public posting of Exhibit A to Mr. Lide's request was ever made.

Attached hereto is an Order from MDL 3084 that ruled that portions of Exhibit A to the Notice to Produce served by Mr. Lide in the *Jones* matter (and referenced below) amount to a breach of MDL 3084's Protective Order. Per this order, you should take efforts to destroy Exhibit A to the Notice to Produce.

I am not counsel in the *Jones* matter and do not know who the parties are. To the extent any other counsel for the Defense has Exhibit A to the Notice to Produce, they should destroy it too.

Sincerely,

Bret Stanley

---

**From:** Evan J. Lide <[elide@stark-stark.com](mailto:elide@stark-stark.com)>  
**Sent:** Thursday, August 14, 2025 1:44 PM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Cc:** Madeline S. Baio <[madeline.baio@wglaw.com](mailto:madeline.baio@wglaw.com)>; [caseymjonesz175365@stark-stark.filevineapp.com](mailto:caseymjonesz175365@stark-stark.filevineapp.com)  
**Subject:** RE: Protective Order Violations re: In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation; Case No. 2:23-md-03084-CRB

Veronica

I believe the only issue as it relates to the Casey Jones v. Uber case (where I am counsel of record), was a notice to produce that contained what has now been determined to be part of the protective

order.

In order to remediate this, I can withdraw the portions of my notice to produce that relate to that.

Kindly advise.

I have cc'd Madeline Baio who is counsel for Uber in that case. I am not aware of the NTP being included in any public court filing as it relates to my client.

---

**Evan J. Lide, Esq.**

he/him/his

Shareholder

*Certified by the Supreme Court of New Jersey as a Civil Trial Attorney*

**t:** 609.895.7253 | **c:** 609.851.6163 | **f:** 609.896.0629

**e:** [elide@stark-stark.com](mailto:elide@stark-stark.com)

Legal Secretary: Holly Ayash, 609.219.7419

Stark & Stark PC

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P.O. Box 5315, Princeton, NJ 08543 (Mailing)

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Thursday, August 14, 2025 2:41 PM

**To:** Bruce H. Stern <[bstern@stark-stark.com](mailto:bstern@stark-stark.com)>; Evan J. Lide <[elide@stark-stark.com](mailto:elide@stark-stark.com)>

**Cc:** Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** [EXTERNAL] Protective Order Violations re: In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation; Case No. 2:23-md-03084-CRB

Counsel,

As advised in our July 18 communication, we represent Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC in In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation. Please see the attached letter regarding the MDL court's August 12 ruling on Defendants' Motion to Enforce Protective Order for violations concerning the use of protected materials

produced in the MDL.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Gromada, Veronica G. (SHB)

**Sent:** Friday, July 18, 2025 9:32 PM

**To:** [bstern@stark-stark.com](mailto:bstern@stark-stark.com); [elide@stark-stark.com](mailto:elide@stark-stark.com)

**Cc:** Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>

**Subject:** Protective Order Violations re: In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation; Case No. 2:23-md-03084-CRB

Counsel,

We represent Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC in In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation. Please see the attached letter regarding Protective Order violations concerning the use of protected materials produced in the MDL. A copy of the December 28, 2023, Protective Order is included for your reference.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



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# EXHIBIT O

**From:** [Bret Stanley](#)  
**To:** "Gromada, Veronica G. (SHB)"; [Steven Cohn](#); [Chris Cox](#)  
**Cc:** [Roopal Luhana](#); [Rachel Abrams](#); [Sarah London](#); [Andrew Kaufman](#); [An Truong](#); [Priest Johnson, Kimberly \(SHB\)](#); [Shortnacy, Michael \(SHB\)](#); [Kirk, Brittany E. \(SHB\)](#)  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order  
**Date:** Thursday, August 28, 2025 2:19:00 PM  
**Attachments:** [CivilCaseJacket \(63\).pdf](#)  
[image004.png](#)  
[image005.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)

---

Veronica,

This was filed today in Soto.

Sincerely,

Bret Stanley

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Wednesday, August 27, 2025 3:54 PM  
**To:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>; Kirk, Brittany E. (SHB) <[bkirk@shb.com](mailto:bkirk@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

(+Brittany Kirk. Please include her on future communications.)

Bret,

We are sorry for your loss. And thank you for the update.

Please send us confirmation once you have given notice to the Soto court.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Bret Stanley <[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com)>  
**Sent:** Wednesday, August 27, 2025 10:19 AM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest

Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

## EXTERNAL

Veronica –

On Wednesday of last week the mother of my closest childhood friend passed after a 14-year battle with Parkinson's. She was very dear to me. The visitation was Friday and funeral was Saturday in my hometown. On my way out of town, I intended for the email including the MDL Court's Order to go to Judge Hurd in the *Lord* matter and was surprised that it did not. Thereafter, I was dealing with personal matters and didn't realize that the email had not gone out to Judge Hurd until Uber's filing in the *Lord* matter yesterday. I recognize that you mentioned non-compliance in the *Lord* matter in your email below, however I thought you were working from stale information.

Concerning, the *Jones* matter, I contacted the Court and requested to send the information to the Court directly. However, since I am not counsel of record in that matter, the Court required a filing to occur with the Order and I requested a filing be made by Plaintiff's Counsel. From what Counsel of Record has told me, that filing was made and the *Jones* Court has been delivered the Order.

Concerning the *Soto* matter, my position remains that I did not disclose any information to the attorneys who are claimed to have made the requests subject to Cisneros's Order. I'm not counsel of record and no attorney connected to me claims to know who the attorneys are. I have called Corey Gaul and left a voicemail, but his email is not on Exhibit 17 and is not on their website. I am working to find information about which judge is handling the matter. I believe my intervention in the *Soto* matter is beyond the scope of the Order but **I am making efforts today to notify the attorneys involved and the Court.**

If you'd like to have a conversation about this, I'm available. If not, these will be my positions if you decide to move forward with a filing with Cisneros concerning lack of compliance.

Bret Stanley



**Bret Stanley** | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098

Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460

[BStanley@johnsonlawgroup.com](mailto:BStanley@johnsonlawgroup.com) | [www.johnsonlawgroup.com](http://www.johnsonlawgroup.com)

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**From:** Bret Stanley

**Sent:** Tuesday, August 26, 2025 4:33 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Attached is the email sent to the Court in the *Lord* Matter that includes the Protective Order. If you desire to bring this to the attention of Judge Cisneros, I'd ask that we have a conversation about that first.

Sincerely,

Bret Stanley

---

**From:** Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>  
**Sent:** Tuesday, August 26, 2025 4:07 PM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Veronica –

The Correspondence to the Court in the *Lord* matter was hung in my outbox. We notified the court in both the *Jones* matter and in the *Smith* Matter. I didn't realize the email to Judge Hurd in the *Lord* matter was not received.

As you know, Uber Counsel for Bowman and Brook have now notified the Court in *Lord* and I intend to inform the Court now.

We can have a call about this today or tomorrow, at your convenience.

Sincerely,

Bret Stanley

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Friday, August 22, 2025 5:54 PM  
**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** In re Uber, Proposed Joint Order re Protective Order

[EXTERNAL]

Bret,

As you know, the Court entered an Order on August 18, 2025 regarding the Protective Order violations. You and the PSC agreed to that Order.

Among other things, the August 18, 2025 Order requires that within three days (August 21, 2025), you:

...identify to Defendants' counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information covered by the Protective Order, including without limitation, the Confidential Information, **and** Mr. Stanley shall identify to Defendants' counsel **all court proceedings in which Mr. Stanley is aware that the Confidential Information has been used or disclosed in discovery or otherwise;**



(d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this Order to all persons **and courts** identified pursuant to paragraph (c) of this Order with notice to Defendants' Counsel of same...

Thus, you were not simply required to identify persons to whom you disclosed confidential information, but also to identify "all court proceedings in which [you are] **aware**" that confidential information has been disclosed and provide a copy of the August 18, 2025 Order to those courts.

You have failed to comply with the August 18, 2025 Order as follows:

1. Lord: You have not provided a copy of the August 18, 2025 Order to the court.
2. Casey Jones: Even though you are aware that confidential information is being used in this case, you have not provided a copy of the August 18, 2025 Order to the court.
3. Soto: Even though you are aware that confidential information is being used in this case and has been disclosed to the plaintiff's counsel, you have not provided notice and a copy of the August 18, 2025 Order to the plaintiff's counsel or to the court.

In addition to the August 18, 2025 Order, the MDL Protective Order separately requires certain actions in the event confidential information is disclosed. [ECF, par. 10]

We intend to raise your non-compliance with the August 18, 2025 Order with the MDL Court if the above violations are not remedied by 3:00pm PST on Monday, August 25, 2025.

**Veronica G. Gromada**

*Partner*

Shook, Hardy & Bacon L.L.P.

713-546-5683 | [vgromada@shb.com](mailto:vgromada@shb.com)



---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 15, 2025 3:52 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve and Bret,

Defendants accept the proposed edits. We will present the revised version to the court as an agreed proposed order.

Thank you.

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 2:12 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabels@peifferwolf.com](mailto:rabels@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Veronica,

Our proposed edits are attached in redline.

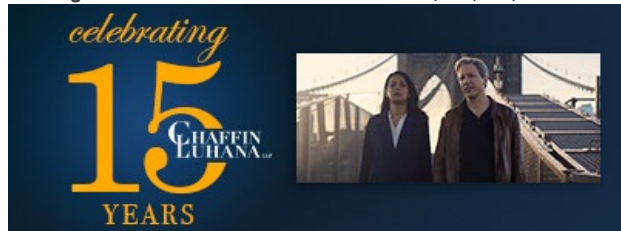
Thanks,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** (347) 269-4465

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**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>

**Sent:** Friday, August 15, 2025 1:43 PM

**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabels@peifferwolf.com](mailto:rabels@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

Veronica,

We should have our proposed edits to you shortly.

Thank you,  
Steve

**Steven Cohn | Partner**

**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)

**P:** (347) 269-4465

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---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Friday, August 15, 2025 11:48 AM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Good morning, Steve and Bret.

We're following up regarding the proposed joint order sent yesterday. Do you have any comments regarding the proposed order? We would like to prepare the submission before the end of the workday.

Please let us know your thoughts.

Thank you.

---

**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>

**Sent:** Thursday, August 14, 2025 1:28 PM

**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>

**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrabs@peifferwolf.com](mailto:rabrabs@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpj@shb.com](mailto:kpj@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>

**Subject:** RE: In re Uber, Proposed Joint Order re Protective Order

Steve,

Please see the attached proposed order for your review.

Thanks

---

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>  
**Sent:** Thursday, August 14, 2025 11:24 AM  
**To:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabels@peifferwolf.com](mailto:rabels@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** Re: In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

Thank you.

**Steven Cohn | Partner**  
**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)  
**P:** (347) 269-4465

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**From:** Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Sent:** Thursday, August 14, 2025 12:22 PM  
**To:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabels@peifferwolf.com](mailto:rabels@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Priest Johnson, Kimberly (SHB) <[kpi@shb.com](mailto:kpi@shb.com)>; Shortnacy, Michael (SHB) <[mshortnacy@shb.com](mailto:mshortnacy@shb.com)>  
**Subject:** In re Uber, Proposed Joint Order re Protective Order

Hi, Steve.

We're working on a draft Order and will have it to you in about an hour.

Thanks.

**From:** Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>  
**Sent:** Thursday, August 14, 2025 9:01 AM  
**To:** Chris Cox <[christopher.cox@kirkland.com](mailto:christopher.cox@kirkland.com)>; Gromada, Veronica G. (SHB) <[vgromada@shb.com](mailto:vgromada@shb.com)>  
**Cc:** Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>  
**Subject:** In re Uber, Proposed Joint Order re Protective Order

**EXTERNAL**

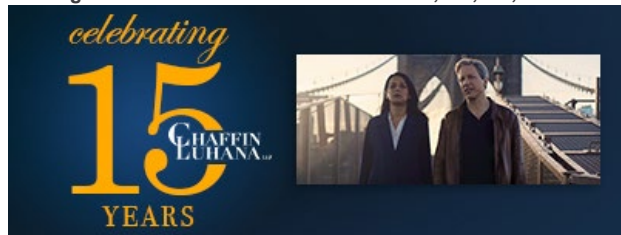
Veronica/Chris,

Per the Court's Order (ECF 3692), please let us know if you are available to meet and confer this afternoon regarding the Proposed Order related to the Protective Order. Alternatively, if you can send us a draft proposed order, we can review and let you know if we agree or have any proposed edits (and then meet and confer if there are any issues that remain).

Thanks,  
Steve

**Steven Cohn | Partner**  
**E:** [cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)  
**P:** [\(347\) 269-4465](tel:(347)269-4465)

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